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NOV 21 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 21, 2003

**By Hand Delivery**

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-B204  
Washington, D.C. 20554

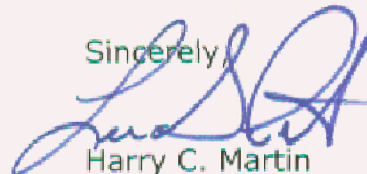
RE: Petition For Rulemaking  
Horseshoe Beach, Florida - Channel 234C3  
Living Proof, Inc., Petitioner - FRN: 0006-2429-11

Dear Ms. Dortch:

Living Proof, Inc., by and through its attorneys, hereby submits this Petition for Rulemaking to reserve the above-reference vacant commercial FM allotment for noncommercial use. This Petition is being submitted in accordance with the Public Notice, dated September 30, 2003, requiring that such Petitions be submitted by November 21, 2003 (DA 03-2990).

Should there be any questions regarding this Petition, please contact undersigned counsel.

Sincerely,



Harry C. Martin  
Lee G. Petro

Counsel for Living Proof, Inc.

Enclosures

cc: Ms. Rolanda F. Smith, Audio Division  
Media Bureau - Room 2-B450

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03-426

ORIGINAL

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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NOV 21 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of: }  
 }  
Amendment of Section 73.202(b), }  
Table of Allotments, }  
FM Broadcast Stations }  
 }  
(Horseshoe Beach, Florida) }

MB Docket No.:  
RM-\_\_\_\_\_

TO: CHIEF, MEDIA BUREAU

**PETITION FOR RULEMAKING**

Living Proof, Inc. ("Living Proof"), by and through its attorneys, hereby submits this Petition for Rulemaking to reserve Channel 234C3, Horseshoe Beach, Florida, for noncommercial use. This Petition is being submitted in response to the *Public Notice*<sup>1</sup> establishing a filing window for reserving existing, vacant commercial FM allotments in accordance with the procedures set forth in the recently-adopted noncommercial FM reservation rules.<sup>2</sup>

As discussed in more detail below, Channel 234C3 at Horseshoe Beach, Florida, can be reserved for noncommercial use under the procedures and standards set forth in the *Public Notice* and the *NCE Second Report and Order*. In particular, supporting this Petition is an engineering statement, attached hereto as Exhibit One, demonstrating that no reserved channel can be allotted to serve Horseshoe Beach, and that the proposed reservation would provide significant first and second NCE service to the proposed primary service contour of the facility in

<sup>1</sup> *Media Bureau Opens Window to Permit Noncommercial Educational Reservation Showings for Certain Vacant FM Allotments*, Public Notice, DA 03-2990 (rel. Sept. 30, 2003) (the "Public Notice").

<sup>2</sup> *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Report and Order, 18 FCC Rcd 6691 (2003) ("*NCE Second Report and Order*").

excess of the 10% threshold established in the *NCE Second Report and Order*. Therefore, Living Proof respectfully submits that the reservation of Channel 234C3 at Horseshoe Beach, Florida, will be in the public interest.

## **I. BACKGROUND**

In 1997, Congress granted authority to the Commission to hold auctions to resolve conflicts among mutually-exclusive new and major change applications.<sup>3</sup> In response, the Commission determined that NCE entities seeking nonreserved, commercial FM and Television channels would be required to participate in auctions.<sup>4</sup> However, before this rule came into effect, the U.S. Court of Appeals for the D.C. Circuit vacated the requirement for NCE entities to participate in auctions for nonreserved spectrum.<sup>5</sup>

In response to the *NPR* decision, and based on the subsequent comments submitted in response to a *Second Further Notice of Proposed Rulemaking*<sup>6</sup>, the Commission modified the process by which qualifying NCE entities could reserve noncommercial FM and TV spectrum for noncommercial educational use. Noting that a large number of FM allotments had been made prior to the modification of the noncommercial reservation rules, the Commission indicated that it would establish a window by which those allotments made prior to August 7, 2000, could be reserved, under certain circumstances.<sup>7</sup>

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<sup>3</sup> *Balanced Budget Act of 1997*, Pub. L. No. 105-33, Title III, 111 Stat. 251 (1997).

<sup>4</sup> *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Report and Order, 15 FCC Rcd 7386, 7429 (2000).

<sup>5</sup> *NPR v. FCC*, 254 F.3d 226, 229 (D.C.Cir. 2001).

<sup>6</sup> *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 3833 (2002).

<sup>7</sup> *NCE Second Report and Order*, ¶ 39.

The Commission established a three-part test to reserve a commercial FM allotment. Specifically, the reservation proponent must demonstrate that:

- (1) maximum class facilities at the proposed allotment site would provide first or second NCE service to at least ten percent of the population within the proposed station's service area and that such population is at least 2000 persons;
- (2) no rule-compliant facility can be authorized at maximum antenna height above average terrain and with maximum effective radiated power on any reserved band channel at four equally-spaced locations with the predicted 60 dBu signal of the maximum same class facility centered on the proposed community of license; and
- (3) no same class rule-compliant facility can be authorized at minimum antenna HAAT and with minimum ERP on any reserved band channel at the city center coordinates for the community of license.<sup>8</sup>

A "rule-compliant" facility would be one that would otherwise comply with the technical and spacing requirements for FM facilities, and that would not cause prohibited interference to existing television stations operating on Channel 6.<sup>9</sup> By satisfying these requirements, the proponent will have established that the vacant nonreserved FM allotment is qualified to be reserved solely for noncommercial, educational purposes. *Id.*

## **II. DISCUSSION**

As shown in Exhibit One, Channel 234C3 qualifies for reservation under the Commission's rules. First, 12.42% (2,125 persons) of the population within the proposed service area will be receiving a first NCE service, and 28.93% (4,949 persons) of the population within the proposed service area will be receiving a second NCE service. Both of these figures are substantially higher than the 10% population threshold established by the Commission.

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<sup>8</sup> *Id.* at ¶ 35.

<sup>9</sup> 47 C.F.R. 73.202(1)(a)(i)

In addition, the Engineering Statement also demonstrates that there are no available reserved FM channels that can be utilized to provide NCE service to Horseshoe Beach, Florida. First, the Engineering Statement shows that a minimum Class C3 facility (6.0 kW at 100 meters height above average terrain ("HAAT")) can not be allotted on any reserved FM channel. Moreover, the Engineering Statement also shows that, among 4 equally-spaced points within the proposed 60 dBu contour, a maximum Class C3 facility (25.0 kW at 100 meters HAAT) could not be allotted on any reserved FM channel.

Therefore, it is clear from the Engineering Statement both that a rule-complaint reserved channel FM allotment can not be made at Horseshoe Beach, and "that NCE service is in fact needed" at Horseshoe Beach,<sup>10</sup> In light of this showing, Living Proof respectfully requests that the Commission amend the FM Table of Allotments for Channel 234C3 at Horseshoe Beach as follows:

<u>Community, State</u>	<u>Current Channel No.</u>	<u>Proposed Channel No.</u>
Horseshoe Beach, Florida	234C3	234C3*

Living Proof, Inc., certifies that it will apply for the requested channel if allotted, and, if successful in obtaining the construction permit for the facility, will construct the station.

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<sup>10</sup> *Id.* ¶ 33.



### **III. CONCLUSION**

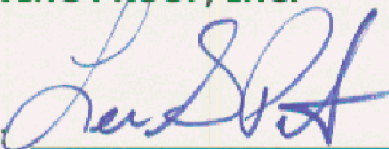
WHEREFORE, in light of the foregoing, Living Proof, Inc. respectfully requests that the Commission grant the petition for rulemaking and reserve Channel 234C3 at Horseshoe Beach, Florida for noncommercial use.

The reservation of the allotment would deliver 2,125 persons their first NCE service, 4,949 persons their second NCE service, and would best serve the public interest.

Respectfully submitted,

**LIVING PROOF, INC.**

By



Harry C. Martin  
Lee G. Petro

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Its Counsel

November 21, 2003

Engineering Statement  
In response to MMB Window Closing November 21, 2003  
Providing for Conversion of  
Commercial Allotments to Noncommercial Allotments

**Horseshoe Beach, FL 234C3**

Robert Moore  
November 19, 2003

Public Notice DA 03-2990<sup>1</sup> and Report and Order 18 FCC Rcd 6691<sup>2</sup> state that three distinct engineering criteria must be satisfied to qualify an allotment. These must demonstrate 1) need for an additional NCE service, 2) unsuitability of any NCE channel at the site at the proposed city of license and 3) unsuitability of any NCE channel at four points near the edge of the protected contour surrounding the city of license. These will be demonstrated in order.

1) Need for Additional NCE Service – NCE Second Report and Order ¶34

The graphic below illustrates the 60 dBu coverage of existing NCE authorizations (shown in black) that intersect the 60 dBu contour of the proposed allotment when it is evaluated at it's allotment site (shown in red). The graphic demonstrates that 41.35% (7,074 out of 17,108 people) of the population covered by the allotment would be newly served with first or second NCE service NCE programming by conversion of the channel to NCE status. Of these 12.42 % would receive their first NCE service (shown in red) and 28.93 % would receive their second NCE service (shown in green). The remaining population (shown in black) is already served by two NCE stations. This coverage significantly exceeds the 10% and 2,000 people specified in the R&O.

2) City of License Site – NCE Second Report and Order ¶35b

The city coordinates are given at <http://www.fcc.gov/mb/audio/bickel/atlas2.html> as HORSESHOE BEACH, FL Latitude: N 29 26 27 Longitude: W 83 17 14 . A minimum class C3 facility (6 kW at 100 m HAAT) was evaluated at each NCE channel. The entries \*IN\* and \*OUT\* represent the incoming and outgoing contour overlap with each specified station, or spacing, as in FMCONT output, is given in km. Only negative results, indicating prohibited contour overlap or spacing violation, are displayed. The existence of even one negative value for a channel shows that that channel is not available at the specified site with the specified facilities. Note that all stations in the CDBS are included here, whether authorized or not, since most, if not all, are included in closed Mx groups, so there is no longer an opportunity for new entrants to file. This table shows that all the NCE channels are unavailable at this site for the specified facility.

3) Cardinal Sites – NCE Second Report and Order ¶35a

Availability was also evaluated at 38 km (39 km class C3 class contour distance - 1 km) of from the city of license site at azimuths of 0, 90, 180 and 270 degrees. In these evaluations, a class maximum facility was utilized. The entries are interpreted as in 2). These tables show that no NCE channels are available at these sites for the specified facility.

Conclusion:

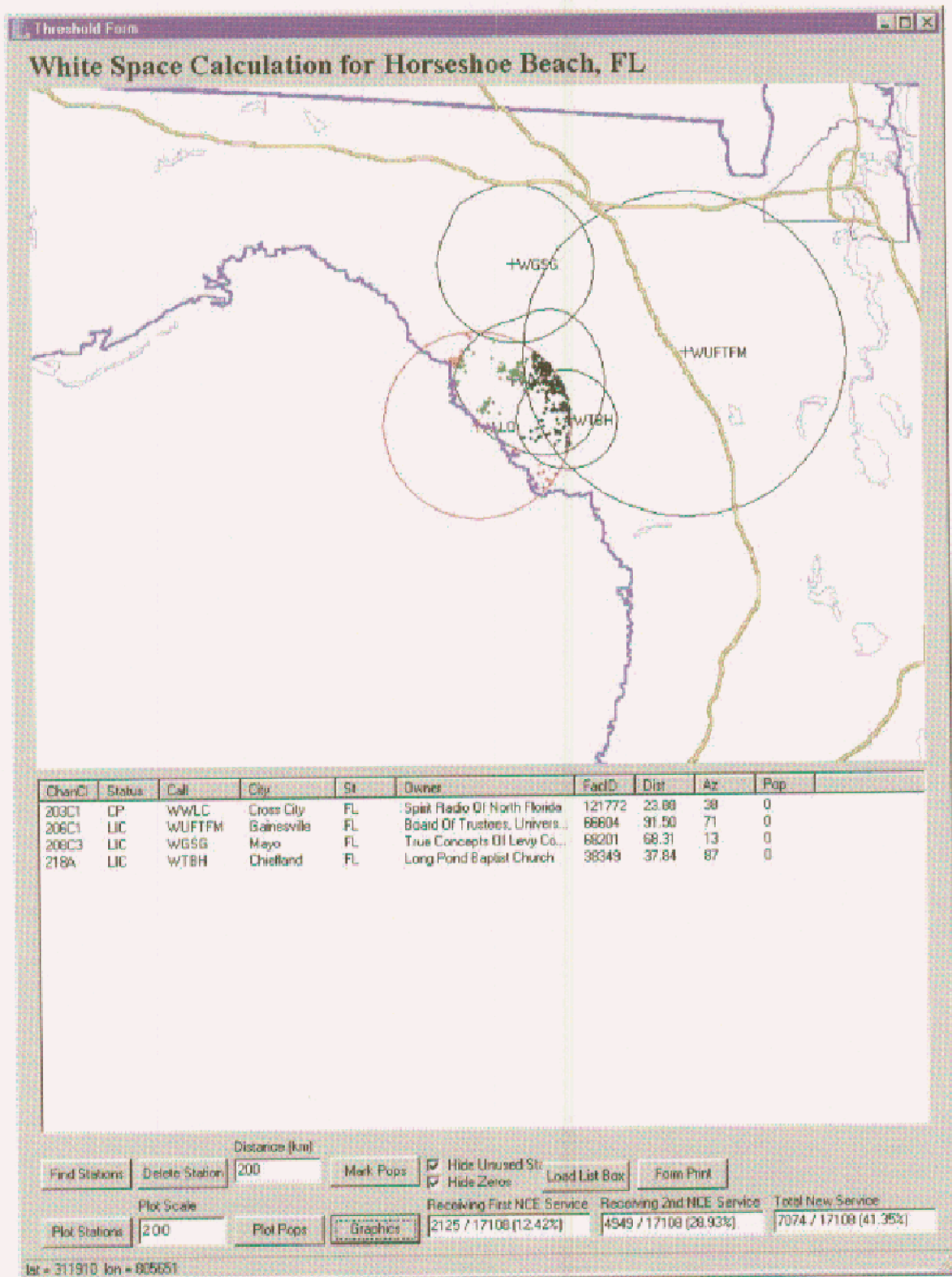
The criterion specified by the Commission is satisfied by this allocation and it can be considered for conversion to an NCE allocation.

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<sup>1</sup> Media Bureau Opens Window to Permit Noncommercial Educational Reservation Showings for Certain Vacant FM Allotments, Public Notice, DA 03-2990 (rel. Sept. 30, 2003) (the "Public Notice").

<sup>2</sup> Reexamination of the Comparative Standards for Noncommercial Educational Applicants, Second Report and Order, 18 FCC Rcd 6691 (2003) ("NCE Second Report and Order").

## 1) Need for Additional NCE Service



## 2) City of License Site



Showing of available NCE channels at Horseshoe Beach, FL

Latitude 292627 Longitude 831714 ERP(Kw) 6.000 HAAT(m) 100 COR AMSL(m) 100

Chan	Call	*IN*	*OUT*	Margin
201	WAYT.C	-37.8	-4.9	
	WWLC	-6.4	-1.7	
202	WLMS	-10.1	-14.8	
	WWLC	-38.5	-42.2	
203	WWLC	-84.3	-85.2	
204	WWLC	-38.5	-42.2	
205	WWLC	-6.4	-1.7	
	WYFE	-34.8	-6.5	
	WFSUFM	-58.8	-14.8	
	WUFTFM	-36.5	-20.1	
206	WWLC	-6.4	-1.7	
	WUFTFM	-103.7	-63.1	
207	WUFTFM	-36.5	-20.1	
	AP207	-31.3		
	WGSG	-11.5	-7.4	
208	WKSG	-8.9		
	WGSG	-63.6	-50.4	
209	WGSG	-11.5	-7.4	
210	WJCTFM	-5.7		
	WJCTFM	-5.2		
211	WJUF	-35.2	-20.6	
212	WYJC	-47.0	-20.2	
	WYFB	-6.5		
213	WYFB	-71.7	-34.6	
214	WYFB	-6.5		
215	WAQV	-15.6	-19.8	
216	WUJC	-30.9	-18.4	
217	WOLR	-46.0	-38.6	
	WTBH	-22.0	-27.2	
218	WTBH	-61.7	-70.1	
	WFSQ	-27.1		
	WFSQ.C	-25.8		
219	WTBH	-22.0	-27.2	
	WJLF	-6.0	-20.5	
220	WHGN	-46.2	-31.3	
	WHGN.C	-46.2	-31.3	
	WNFK			-14.5

### 3) Cardinal Sites:

#### 0 degrees:

Showing of available NCE channels at Horseshoe Beach, FL

Latitude 294/01 Longitude 831/14 ERP(Kw) 25.000 HAAT(m) 100 COR AMSL(m) 108

Chan	Call	*IN*	*OUT*	Margin	Chan	Call	*IN*	*OUT*	Margin
201	WAYT.C	-82.2	-65.3		213	WYJC	-29.7	-26.0	
	WHIJ		-6.0			WYFB	-84.6	-68.3	
	WWLC	-16.9	-2.8			WANM		-8.8	
202	WAYT.C	-23.5	-11.9		214	WYFB	-22.7	-14.8	
	WTLG	-10.4	-25.4		215	WVVSFM		-10.9	
	WLMS		-13.4			WKTZFM	-0.8		
	WWLC	-49.6	-58.6			WAQV	-2.2	-22.9	
203	WVDA	-27.8	-31.5			WUJC	-19.7	-21.3	
	WWLC	-98.7	-112.1		216	WUJC	-66.5	-74.7	
204	WWLC	-49.6	-58.6			WOLR	-40.3	-41.6	
	WFSUFM	-38.0	-21.6		217	WUJC	-19.7	-21.3	
205	WWLC	-16.9	-2.8			WOLR	-90.3	-95.1	
	WYFE	-10.2				WTBH	-17.8	-28.9	
	WFSUFM	-102.7	-75.0		218	WOLR	-40.3	-41.6	
	WUFTFM	-50.7	-40.0			WTBH	-57.6	-82.4	
	WGSG	-9.5	-3.7			AP218		-9.5	
206	WWLC	-16.9	-2.8			WFSQ	-58.8	-35.3	
	WFSUFM	-38.0	-21.6			WFSQ.C	-57.5	-35.9	
	WUFTFM	-117.8	-93.5			WAPB.C		-0.4	
	WGSG	-9.5	-3.7			WNFK	-2.7		-2.7
207	WUFTFM	-50.7	-40.0		219	WTBH	-17.8	-28.9	
	AP207	-50.3	-29.1			WWET.A		-6.9	
	WGSG	-57.8	-59.4			WWET		-6.3	
208	WKSG	-7.2	-3.9			WJLF	-26.5	-51.9	
	WGSG	-110.0	-112.9			WAPB.C	-3.1	-53.9	
209	WGSG	-57.8	-59.4			WNFK	-2.7		-2.7
	WVFS		-10.8		220	WAPB.C		-0.4	
210	WGSG	-9.5	-3.7			WKVH	-4.6	-25.1	
	WJCTFM	-31.8	-7.2			WHGN	-28.3	-29.6	
	WJCTFM	-31.3	-7.0			WHGN.C	-28.3	-29.6	
211	WGSG	-9.5	-3.7			WKVH.A	-10.5	-28.5	
	WJUF	-16.3	-18.0			WKVH.A	-10.5	-28.5	
	WYJC	-29.7	-26.0			WNFK	-43.9	-49.5	-49.7
212	WYJC	-90.1	-79.5						
	WYFB	-22.7	-14.8						

## 90 degrees:

Showing of available NCE channels at Horseshoe Beach, FL

Latitude 292627 Longitude 825344 ERP(Kw) 25.000 HAAT(m) 100 COR AMSL(m) 106

Chan	Call	*IN*	*OUT*	Margin				
201	WAYT.C	-29.0	-12.2			WYFB	-49.7	-40.0
	WHIJ	-27.0	-56.4		213	WYFB	-115.9	-93.6
	AP201		-17.1		214	WYFB	-49.7	-40.0
	WLMS	-4.0	-12.6			WMFEFM	-4.7	
	WWLC	-13.8	-13.0			WAQV	-15.6	-23.3
202	WHIJ		-3.0		215	WKTZFM	-16.1	-5.1
	WTLG	-32.4	-47.3			WAQV	-56.0	-76.7
	WLMS	-44.9	-66.1			WTBH	-39.0	-22.7
	WWLC	-75.0	-69.6		216	WAQV	-15.6	-23.3
203	WLMS	-4.0	-12.6			WKES	-19.6	
	WWLC	-140.3	-123.0			WUJC	-11.9	-20.8
	WUFTFM		-14.9			WOLR	-16.4	-21.2
204	WWLC	-75.0	-69.6			WTBH	-39.0	-22.7
	WUFTFM		-14.9		217	WOLR	-60.1	-74.7
205	WWLC	-13.8	-13.0			WWKO		-45.2
	WYFE	-53.8	-44.1			WHIF		-5.1
	WFSUFM	-49.9	-22.2			WTBH	-67.6	-78.8
	WUFTFM	-80.4	-69.5		218	WOLR	-16.4	-21.2
206	WWLC	-13.8	-13.0			WLPJ.C	-8.2	-17.1
	WUFTFM	-147.5	-123.1			WTBH	-107.3	-132.3
207	WUFTFM	-80.4	-69.5			990415		-6.6
	AP207	-6.5				990916		-10.1
	WKFA.C		-3.4			AP218		-27.9
	WKSG	-0.9				WFSQ	-7.0	
	WGSG	-21.3	-22.9			WLPJ	-14.7	-16.3
208	WUFTFM		-14.9			WFSQ.C	-5.7	
	WKSG	-56.4	-53.1			990917		-6.4
	WKSG	-6.3	-33.1			WJLF	-16.5	-27.9
	WGSG	-73.3	-76.3		219	WTBH	-67.6	-78.8
209	WUFTFM		-14.9			WJLF	-49.9	-81.5
	WKSG	-0.9				WAPB.C		-4.5
	WGSG	-21.3	-22.9			WHGN	-29.7	-28.9
	WUSF	-15.3				WHGN.C	-29.7	-28.9
210	WJCTFM	-46.8	-22.2		220	WTBH	-39.0	-22.7
	WJCTFM	-46.4	-22.1			WJLF	-16.5	-27.9
	WJUF	-17.2	-17.2			WHGN	-81.0	-82.4
211	WJUF	-68.8	-70.6			WHGN.C	-81.0	-82.4
212	WJUF	-17.2	-17.2					
	WYJC	-36.6	-26.1					

# 180 degrees:

Showing of available NCE channels at Horseshoe Beach, FL

Latitude 290553 Longitude 831714 ERP(Kw) 25.000 HAAT(m) 100.0 COR AMSL(m) 100

Chan	Call	*IN*	*OUT*	Margin
201	WAYT.C	-13.5		
	WHIJ		-20.5	
	AP201		-24.7	
	WLMS		-6.9	
202	WLMS	-39.5	-60.4	
	WWLC	-21.3	-27.6	
203	WLMS		-6.9	
	WWLC	-70.6	-81.1	
	WMNF	-12.6		
204	WWLC	-21.3	-27.6	
	WYFE	-18.1	-12.7	
205	WYFE	-78.9	-66.2	
	WFSUFM	-34.8	-6.9	
	WUFTFM	-28.8	-18.1	
206	WYFE	-18.1	-12.7	
	WUFTFM	-96.0	-71.6	
207	WUFTFM	-28.8	-18.1	
	AP207	-25.1	-3.9	
208	WKSG	-21.3	-18.1	
	WGSG	-37.3	-40.3	
209	WUSF	-31.9	-11.8	
210	WJUF	-16.0	-15.6	
211	WJUF	-67.7	-69.1	
212	WJUF	-16.0	-15.6	
	WYJC	-22.6	-12.0	
213	WYFB	-64.6	-42.0	
	WBVM	-31.0	-9.3	
214	WAQV		-5.0	
215	WAQV	-38.3	-58.5	
216	WAQV		-5.0	
	WKES	-26.1	-4.6	
	WUJC	-12.8	-12.6	
217	WOLR	-16.9	-29.6	
	WWKO		-14.8	
	WTBH	-15.2	-26.2	
218	WLPJ.C	-29.3	-39.4	
	WTBH	-54.9	-79.7	
	WFSQ	-11.8		
	WLPJ	-38.2	-39.8	
	WFSQ.C	-10.5		
219	WTBH	-15.2	-26.2	
	WJLF	-0.8	-31.1	
	WHGN	-28.6	-26.7	
	WHGN.C	-28.6	-26.7	
220	WHGN	-82.1	-80.2	
	WHGN.C	-82.1	-80.2	

Note:

This site is 24 km offshore, and therefore not realizable for that reason.



## 270 degrees:

Showing of available NCE channels at Horseshoe Beach, FL

Latitude 292627 Longitude 834044 ERP(Kw) 25.000 HAAT(m) 100 COR AMSL(m) 100

Chan	Call	*IN*	*OUT*	Margin
201	WAYT.C	-61.0	-44.2	
202	WAYT.C	-2.3		
	WLMS		-10.2	
	WWLC	-18.6	-27.5	
203	WWLC	-65.5	-81.0	
204	WWLC	-18.6	-27.5	
	WFSUFM	-16.4		
205	WYFE	-25.7	-12.9	
	WFSUFM	-81.0	-53.3	
	WUFTFM	-10.6		
206	WFSUFM	-16.4		
	WUFTFM	-77.8	-53.4	
	AP207	-10.8	-2.4	
207	WUFTFM	-10.6		
	AP207	-77.1	-55.8	
	WGSG	-5.2	-7.0	
208	AP207	-10.8	-2.4	
	WGSG	-57.5	-60.4	
209	WGSG	-5.2	-7.0	
	WVFS		-7.9	
210	--- Usable ---			
211	WJUF	-15.8	-17.3	
	WYJC	-8.5	-4.7	
212	WYJC	-68.7	-58.2	
213	WYJC	-8.5	-4.7	
	WYFB	-45.5	-25.7	
	WANM		-5.8	
214	--- Usable ---			
215	WAQV		-12.5	
	WUJC	-14.5	-10.5	
216	WUJC	-72.4	-64.0	
217	WUJC	-14.5	-10.5	
	WOLR	-37.8	-42.6	
	WTBH		-5.7	
218	WTBH	-34.5	-59.2	
	WFSQ	-65.5	-41.9	
	WFSQ.C	-64.2	-42.5	
219	WTBH		-5.7	
	WJLF		-10.9	
	WAPB.C		-16.4	
220	WKVH		-3.2	
	WHGN	-26.1	-27.3	
	WHGN.C	-26.1	-27.3	
	AP220	-1.9		
	WKVH.A		-10.3	
	WKVH.A		-10.3	
	WNFK	-10.5	-15.7	-15.1

Note:

This site is 28.55 km offshore, and therefore not realizable for that reason.